

Safety Defect and Noncompliance Report Guide for Vehicles
PART 573 Defect and Noncompliance Responsibility and Reports¹

On December 31, 2007, Federal Coach, LLC decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. 403) exists in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Responsibility and Reports.

Date this report was prepared: September 16, 2008 _____

Furnish the manufacturer's identification code for this recall (if applicable): 07E-095 _____

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Federal Coach, LLC _____

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

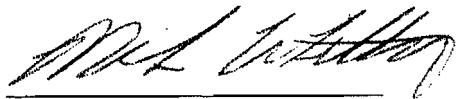
Mike Whitten, Vice President - Engineering _____

Telephone Number: 479-646-6800 _____ Fax No.: 479-646-1217 _____

Name and Title of Person who prepared this report.

Mike Whitten, Vice President - Engineering

Signed:



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DEFECTS INVESTIGATION
RECALL MGMT DIV.

¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Responsibility and Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. George Person at (202) 366-5210, by FAX at (202) 366-7882, or by E-Mail to RMD.ODI@dot.gov.

I. Identify the Vehicle Models Involved in the Recall

2. Identify the Vehicles Involved in the Recall

Federal buses that were manufactured between April 1, 2005 and September 6, 2006 and were equipped with Ricon "S" or "K" series platform lifts.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Vehicles equipped with certain items of equipment from January 1, 1996 through April 1, 1997, then what was the percentage of the recalled Vehicles of all Vehicles manufactured during that time period.

Less than 1%

II. Identify the Recall Population

3. Furnish the total number of vehicles recalled potentially containing the defect or noncompliance.

Model	Year	Number of Vehicles Potentially Involved
Ford 158G (Spirit I)	2006	1
GMC 232 (Cross Country)	2006	1
GMC 232 (Cross Country)	2007	2
Ford 202 G (Spirit III)	2006	1

Total Number Potentially Affected by the Recall: 5

4. Furnish the approximate percentage of the total number of vehicles estimated to actually contain the defect or noncompliance: 100%

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled vehicles:

The recall population was determined by selecting the buses that were equipped with the Ricon lifts models "S" or "K" series lifts recalled by Ricon Corporation.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The threshold warning system on the Ricon lift may not detect the presence of a wheelchair test device when tested in accordance with S7.4 of the FMVSS 403.

Describe the cause(s) of the defect or noncompliance condition.

Results from the misinterpretation of the testing parameters.

Describe the consequence(s) of the defect or noncompliance condition.

The threshold warning signal may not activate when a certain point of the threshold area is encroached.

Identify any warning which can (a) precede or (b) occur.

With the platform lift one inch or more below vehicle floor level, the threshold warning system will activate when a wheelchair or individual using a mobility aid enters the designated threshold area but may deactivate if the wheelchair or mobility aid user continues to move toward a certain point on the threshold area.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Ricon Corp., 7900 Nelson Road, Panorama City, CA 91402

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Stanton Saucier, General Manager

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims. N/A

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

NHTSA Compliance Test Report #638657A and NHTSA -2007-28140 Notice formed the basis for Ricon Corp's determination of noncompliance. There have been no claims, accidents or fatalities associated with this noncompliance.

V. Identify the Remedy

8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.

Upon notification, Ricon will provide the necessary parts to make the retrofit. If the end-user is factory trained to perform this service, the retrofit can be done at the end-user's location. If end-user is not factory trained to perform this service, Ricon will arrange for the retrofit to be performed at the nearest Ricon authorized service center/dealer. The lift retrofit will include removal and replacement of the TWS covers using TWS retrofit kit# 00002. Ricon will provide the parts at no charge and will pay labor of \$37.50 for each retrofit.

9. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

Replacement of the threshold warning system metal covers and optical sensor mounting retainers will correct the noncompliance. Ricon will provide a kit for field replacement at no charge.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The replacement parts can be distinguished from the recall components by location of the openings in the cover where the optical sensors are located. The remedy components will have openings spaced 5.25 inches apart while recall components will have openings spaced 7 inches apart.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

The recall condition was corrected in production by Ricon on all lifts manufactured after October 9, 2007.

VI. Identify the Recall Schedule

10. Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Recall notifications will be sent out starting 9/29/2008.

VII. Furnish Recall Communications

11. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) or by E-Mail to RMD.ODI@dot.gov for review prior to mailing.*

Note that these documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

SAFETY RECALL NOTICE

Dear Sir:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Ricon Corporation has decided that the platform lift installed in your bus fails to conform to Federal Motor Vehicle Safety Standard No. 403.

! I M P O R T A N T !

- Your Threshold Warning System on Ricon's "1200, 2000 and 5500 series platform lifts labeled for "DOT Public Use" is being recalled. It does not apply to other Ricon products.
- You should contact Ricon Corporation at 818-267-3000 for the necessary parts for retrofit or the location of the nearest Ricon authorized service center/dealer.

Why is a recall being conducted?

The non-compliance with S6.1 of the FMVSS 403 is the result of the Threshold Warning System not detecting the presence of a wheelchair or mobility aid user in a certain spot within the defined threshold area. In the event this condition occurs during passenger operations the wheelchair or mobility aid user may move toward the vehicle lift door when the platform is below floor level. This situation could cause personal injury.

What are we doing about the problem?

Upon notification, Ricon will provide the necessary parts to make the retrofit. If you are factory trained to perform this service, the retrofit can be done at your location. If you are not factory trained to perform this service, Ricon will arrange for the retrofit to be performed at the nearest Ricon authorized service center/dealer. The lift retrofit will include removal and replacement of the TWS covers using TWS retrofit kit# 00002. Ricon will provide the parts at no charge and will pay labor of \$37.50 for each retrofit.

What should you do? Contact Ricon Corporation for the free retrofit kit or the location of the nearest Ricon authorized service center/dealer.

Ricon Corporation
A Division of Vapor Bus International
7900 Nelson Road
Panorama City, CA 91402

Phone: 800-322-2884
Fax: 818-267-3001
www.wabtec.com

What if you no longer own this bus with the Ricon lift? Please forward the new owner's name, address and phone number to the following address.

Federal Coach, LLC
2800 South 28th Street
Fort Smith, AR 72908
1-800-292-6210

Who should you contact if you have further questions or concerns? Federal Coach, LLC
2800 South 28th Street
Fort Smith, AR 72908
1-800-292-6210

If you have already paid to have your Ricon platform lift repaired for this condition, you may be eligible for reimbursement of the charges you paid for the repair. To learn more about what you need to do to obtain reimbursement call Ricon Corporation at 1-800-322-2884.

If after having attempted to take advantage of this recall you believe you have not been able to have your platform lift remedied without charge and within a reasonable amount of time, you may submit a complaint to the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Ave., S.E., Washington, D.C., 20590; or call the toll-free Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153); or go to <http://www.safercar.gov>.

We apologize for any inconvenience this safety recall may cause, but your safety is our first concern.

Sincerely,

Federal Coach, LLC